

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
v.)	CASE NO.: 21-cr-0005
)	
JOHN D. WHELAN,)	
)	
Defendant.)	

MOTION TO WITHDRAW DEFENDANT'S MOTION TO RETURN PROPERTY

COMES NOW, Defendant John Whelan, M.D., by and through, the undersigned counsel, Ronald Chapman II, and hereby files this Motion to Withdraw Defendant's Return of Property and in support of this motion states as follows:

1. On April 26, 2022, Defendant Whelan filed a Motion to Return Property with the Court (ECF No. 47).
2. On May 6, 2022, the Court held a status conference on the matter and Defendant's Motion to Return Property was set for hearing.
3. The parties have conferred and have agreed on the return of Eighty-Thousand Dollars (\$80,000.00) to Chapman Law Group for representation in this matter rendering Defendant's Motion to Return Property now moot and ripe for withdrawal.
4. The parties would like to convert the hearing on this matter to a status conference to set a new trial date.

Dated: May 19, 2022,

Respectfully Submitted,
CHAPMAN LAW GROUP

/s/ Ronald W. Chapman, II
Ronald W. Chapman II, Esq., LL.M. (MI Bar P73179)
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the Defendant's Motion was filed and sent to Julie F. Stewart and Kevin Knight, Assistant United States Attorney, Office of the U.S. Attorney for Eastern District of Wisconsin, via the Court's CM/ECF system on May 19, 2022.

/s/ Ronald W. Chapman, II

Ronald W. Chapman II, Esq., LL.M.

Michigan Bar No. P3179

Counsel for Defendant Whelan